



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2024-002 ELA operational workload analysis

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

Record reference	DPR-ELA-2024-002
Title of the processing operation	ELA operational workload analysis
Controller entity	European Labour Authority, Resources Unit, Human Resources Sector (ELA HR Sector)
Joint controllers	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
Processor(s)	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below
Internal organisation(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Deloitte Consulting & Advisory Gateway Building - Luchthaven Brussel Nationaal IJ 1930 Zaventem (Belgium) Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland. The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation (EU) 2016/679.
Data Protection Officer Name and contact details	Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
Corporate Record	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Language of the record	English

¹ Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1 Purpose

The European Labour Authority, Resources Unit, Human Resources Sector (ELA HR Sector) wishes to perform a workload organisational analysis to gain insights into current workload challenges across the Authority, and to seek recommendations for further efficiency improvements and optimisation ahead of anticipated growth of specific activity areas.

The analysis will be founded on qualitative and quantitative inputs, taking into account both top-down (e.g. strategic) and bottom-up (e.g. staff activity allocation, workload) perspectives.

As part of this project, interviews with Heads of Units are organised to develop a view on the overall and Unit-Specific strategy, activities and challenges linked to the performed activities, opportunities for efficiency gains, resulting in a top-down view on the Unit workload.

This analysis should include a set of tools recommended and a collection of ready-to-use practices to enable a sustainable workload management for the future.

The raw data analysed by the external contractor will not be shared with the ELA HR Sector or any other team in the European Labour Authority and therefore will not be used for any other purpose. No profiling or automated decision-making will take place with these data.

1.2.2 Processing for further purposes

- Archiving in the public interest
- Scientific or historical research purposes
- Statistical purposes
- N/A

Safeguards in place to ensure data minimisation

- Pseudonymisation
- Any other, specify

1.2.3 Modes of processing

1. Automated processing (Article 24)
 - a. Computer/machine
 - i. automated individual decision-making , including profiling
 - ii. Online form/feedback
 - iii. Any other, specify
2. Manual processing
 - a. Word documents
 - b. Excel sheet
 - c. Any other, specify

Self assessment surveys to the ELA Staff on the workload based on main activities performed in the Authority.

1.2.4 Storage medium

1. Paper
2. Electronic
 - a. Digital (MS documents (Word, excel, Powerpoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
 - b. Databases
 - c. Servers
 - d. Cloud
3. External contractor premises

1.2.5 Comments on the processing of the data

To perform this analysis the European Labour Authority has engaged an external company: Deloitte, who will act as processor.

To perform the analysis, Deloitte will conduct desk research & semi-structured interviews with Head of Unit and Head of Sectors to gather strategic (top-down) perspectives on workload & challenges, they will analysis the related received documentation (e.g. ELA’s detailed organisational structure, current Full-Time Equivalent (FTE) overview, etc.).

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	ELA Staff ELA Head of Units and Executive Director ELA HR Sector
2. External to organisation	Deloitte acting as Processors

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

ELA Head of Units/Sectors:

Name, Surname, Email, Opinion expressed in an interview related to the workload in their respective Unit (workload context, workload distribution, workload peaks and workload optimization (i.e. measures recommended to reduce/moderate/optimize workload)

ELA Staff:

Unit, Sector, Post, Opinion on the assignment and organisation of the tasks among the Unit/Sector, appropriate task force and collaboration among colleagues, general observations related to the workload assigned.

1.3.2.1 Special categories of personal data

Indicate if the processing operation concerns any ‘special categories of data’ which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:

Yes , the processing concerns the following special category(ies):

Data revealing

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,

Or/and,

- Genetic data, biometric data for the purpose of uniquely identifying a natural person,
- Data concerning health,
- Data concerning a natural person’s sex life or sexual orientation.

N/A

Description:

From nationalities it may be inferred individual’s ethnicity/religion with varying degrees of certainty. However, it is inappropriate to treat all nationalities as special category of data in every instance, as this would mean ELA will need a special category condition just to hold such nationalities. In order to consider nationality as a special category of data in this sense is when the controller collects/uses these inferences linked to the special categories of data to influence his/her activities in any way.

In summary, while nationalities can provide insights into ethnicity or religion, they should not automatically be treated as special category data unless their use directly impacts decision-making or activities governed by data protection rules.

1.3.2.2 Data related to 'criminal convictions and offences'

The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'	N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
---	---

1.4 RETENTION PERIOD

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

Data category	Retention period
All data categories	The data will be used to perform the relevant report on workload analysis and will be deleted/anonymised at latest the end of 2024.
Raw data	ELA will not have access to the raw data but only to aggregated data received from the processor. ELA will instruct the processor, through the relevant Data Processing Agreement, to delete the data from their databases at the end of the contract.

Description

Data will only be used for the stated purpose and will not be reused for any further compatible/non-compatible purpose.

The data will not be use for profiling or making any decision with legal or similar effects on data subjects. ELA will not have direct or indirect access to the personal data, as only aggregated metrics will be shared with ELA by the external contractor, acting as processor.

1.5 RECIPIENTS

Origin of the recipients of the data	
1.	<input checked="" type="checkbox"/> Within the EU organization ELA HR Sector colleagues on a need to know basis
2.	<input checked="" type="checkbox"/> Outside the EU organization Processor

Categories of the data recipients	
1.	<input checked="" type="checkbox"/> A natural or legal person
2.	<input type="checkbox"/> Public authority
3.	<input checked="" type="checkbox"/> Agency
4.	<input type="checkbox"/> Any other third party, specify

--

Description

Deloitte will have access to all data related to the self assessment and interviews from the Head of Units and Sectors.

HR staff on a need to know basis will only have access to aggregated data as the data collected by the processor will be shared only this way (replies related to the roles or Units but not combined per Units/Sectors), therefore it will not be possible to know who replies what.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data
<p>1. Transfer outside of the EU or EEA</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> YES,</p>
<p>2. Transfer to international organisation(s)</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p>
<p>3. Derogations for specific situations (Article 50.1 (a) –(g))</p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p>

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p>

1.7.1 Privacy statement

The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

Publication of the privacy statement

Published on website

Web location:

- ELA internal website (URL: Sharepoint on personal data protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Guidance on data subjects' rights available on ELA main website.

1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

Description:

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Labour Authority or its contractors.

The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect personal data, the European Labour Authority has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.